

EPA NJDEP Hess Meeting (Conceptual Site Model)

January 21, 2021

8:30am – Microsoft Teams

Attendees:

NJDEP – Julia Galayda, Jill Monroe, Ann Charles

EPA – Sameh Abdellatif, Gina Ferreira

Hess – John Schenkewitz

Earth Systems – Amy Blake, John Virgie, Rick Ofsanko

Newfields – Dave Puchalski

Meeting Notes

JS opened the meeting and asked if anyone had anything to say regarding the CSM as a whole.

Potential Remedial Options

JM stated that the NJDEP wants to make sure that it is clear that all free and residual product requires remediation and that MNA is not an acceptable strategy for addressing free and residual product.

AB explained that the plan is to use a combination of ex situ and in situ remedial options to address any areas of LNAPL or source areas. The remedial strategy for the site is a combined strategy of addressing source areas and utilizing institutional and engineering controls.

JM stated that her impression of the report was that it did not seem to mention remediating free product.

Class IIB Aquifers

JM wanted to address the mention of establishing a Class IIB aquifer in the CSM. JM stated that establishing one is not realistic and that it isn't going to be allowed.

AC stated that there are no Class IIB aquifers in the state and that NJDEP has seen over the years that this is often mentioned, but it is not relevant and should be removed.

JM stated that regardless of classification, the Responsible Party must still remediate groundwater source material.

Historic Temporary Well Data

JM stated that she knows there are a lot of samples, but that there should be a figure showing all temporary wells.

AB explained that some of the sample points are old and were used to justify new sampling points; therefore, we feel like the current well network is representative of current groundwater plumes/conditions.

JS wanted to discuss the inclusion of temporary wells further. JS thinks the emphasis should be on current data.

AC/JM stated that including the temporary well data would be helpful. AC stated that it helps to further support permanent monitoring well locations and shows if an area hasn't been investigated.

JS stated that we aren't ignoring the historic data, but that it is concerning that the emphasis does not seem to be on current data.

AB stated that the goal of the CSM is understanding sources and how things have migrated; some examples include the TLR and oily lagoon. Historic data and current data shows source areas and impacts, new/current data is being used to show migration and what plumes look like currently, so we can refine a remedial strategy.

AC stated that maybe it would be helpful in AOC specific reports to include the temporary well information.

AB explained that temporary well data is included in the Remedial Investigation Workplans. AB requested confirmation that the NJDEP wanted temporary well data included in the next version of the CSM.

JM confirmed that it would be included for reference purposes to see historic vs. current conditions.

JS expressed concern that historic data would be used for more than reference purposes and that NJDEP would expect historic data to be utilized over current data to make decisions. In addition, the CSM already includes a lot of data, and we want to be as concise as possible with what we include in the report.

Remedial Action Discussion

GF questioned the purpose and timing of the CSM and why there was a discussion of remediation options included in the report, which seemed premature.

AB explained that from a conceptual standpoint - we are trying to get everyone on the same page with contaminants, plumes, and then the general plan for remediation (but no specifics). The remediation section was included so that it was clear that a combined approach would be utilized on the Site. AB explained that the CSM was prepared now in order to take a holistic look at site conditions (and document those conditions).

Ecological Issues

GF inquired about the status of the EE.

AB explained that initially we collected data from Smith Creek and Smith Creek Pond and that additional data collection is necessary in Site wetlands and the Arthur Kill. AB explained that the Supplemental RIW (dated 7/30/2021) is currently being reviewed by the NJDEP/EPA and includes any proposed sampling that the NJDEP recommended.

JG stated that the RIW is currently in review with the ecological group and that the Supplemental RIW was submitted in July 2021.

GF confirmed that she has a copy of the July 2021 report and will coordinate with the NJDEP to review it.

CEA Discussion

AB asked for clarification regarding the comment regarding establishing multiple CEAs/RAPs. (NJDEP Comment 8 – “The completion of the investigation and implemented remedial actions will show if there are multiple AOCs with distinct source area/plumes. This could result in more than one CEA/WRA at the site.”)

JM explained that is how the RA permits are working right now; different CEAs and RAPs depending on contaminants and sources.

AC/JM explained that certain areas could be combined and that it could be discussed further in the future.

AB explained that for formulating future reports it is important that we know how things will ultimately be structured with the CEAs and RAPs.

CSM Approval/Future Revisions/Comment Letter

AC explained that it was discussed internally – that the CSM includes a lot of information and that the NJDEP isn’t going to “fact check” the document

AB/JS requested clarification on future revisions of the document – timing, etc.

JM suggested that the CSM could be updated after the next round of annual groundwater sampling – as one option.

JG requested clarification on whether the CSM would be immediately revised due to this comment letter.

JS questioned whether it makes the most sense to respond to the comment letter and make any changes in the next updated version of the CSM, as opposed to revising the CSM now.

JS discussed future revisions of the CSM and the importance of timing – it won’t make sense to submit revised versions of the CSM if they aren’t reviewed quickly because the information in the report will change as new data and information is collected.

JG stated that she felt that the CSM needed to be revised as part of the response to the comment letter.

AC proposed that Hess/Earth Systems submit a RTC first, and then once that is reviewed and approved – revisions to the CSM can be made.

JS agreed with this approach.

Additional Items Discussed

- Discussed upcoming report submittal and whether NJDEP needed hard copies of figures/tables
- NJDEP requested excel files for data tables only – no hard copies
- Discussed upcoming site visit for the whole team in the Spring and that we will have a meeting prior to the site visit